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24 UBER TECHNOLOGIES, INC.
25 and OTTOMOTTO LLC

26 UNITED STATES DISTRICT COURT
27 NORTHERN DISTRICT OF CALIFORNIA
28 SAN FRANCISCO DIVISION

19 WAYMO LLC,
20 Plaintiff,
21 v.
22 UBER TECHNOLOGIES, INC.,
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF EDWARD
TAKASHIMA IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO LETTER
BRIEF RE: BONDERMAN AND
HUFFINGTON DEPOSITIONS**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

I, Edward Takashima, declare as follows:

1. I am a partner at the law firm of Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the State of California. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Uber’s Administrative Motion to File Under Seal Exhibits to Uber’s Letter Brief Re: Bonderman and Huffington Depositions.

2. I have reviewed the following exhibits and only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1	Entire Document	Uber
Letter Brief	Redactions	Uber

3. The entirety of Exhibit 1 contains highly confidential information regarding business terms, including information about the structure of a business agreement. Uber’s request contains highly confidential information about the deliberations of Uber’s Board of Directors.

4. This highly confidential information is not publicly known, and its confidentiality is strictly maintained.

5. If this information were to be released to the public, Defendants’ competitors and counterparties would have insight into how Defendants structure their business agreements, including what potential terms have been offered, which would allow them to tailor their own business negotiations strategy, such that Uber’s competitive standing could be harmed. Similarly, Uber’s competitive standing would be harmed if its competitors had insight into the meetings of Uber’s Board.

6. The redacted portions of the letter brief contain confidential information discussing Exhibit 1 and their sealing is justified for the same reasons.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 10th day of August, 2017 at Oakland, California.

3
4 Dated: August 10, 2017

BOIES SCHILLER FLEXNER LLP

5 By: /s/ Edward Takashima
6 Edward Takashima

7
8
9 **ATTESTATION OF E-FILED SIGNATURE**

10 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
11 document. In compliance with General Order 45, X.B., I hereby attest that Edward Takashima
12 has concurred in this filing.

13 Dated: August 10, 2017

14 /s/ Karen L Dunn
15 Karen L. Dunn